REMARKS/ARGUMENTS

Claims 1-16 are pending. Claims 1-16 stand rejected in the Office Action mailed October 23, 2003.

Claim 1-10 are rejected under 35 U.S.C. §102(b) as being anticipated by US Patent Number 5,717,893 of Mattson (hereafter Mattson).

Claims 11-16 are rejected under 35 U.S.C. §103(a) as being unpatentable over Mattson in view of the alleged knowledge in the art.

Claims 1, 7, and 11 have been amended. It is respectfully submitted that no new matter has been added.

CLAIM REJECTIONS

REJECTIONS UNDER 35 U.S.C. §102(b)

The Examiner has rejected claims 1-10 under 35 U.S.C. §102(b) as being anticipated by Mattson et al. (U.S. Patent 5,717,893) (hereafter, "Mattson"). Applicants submit that claims 1-10 are not anticipated by Mattson. In regard to the rejection of claims 1 and 7, the Examiner has stated in part that:

> Mattson teaches the invention as claimed including an apparatus and method for dynamically partitioning a cache array based upon requests for memory from an integrated device having a plurality of processors... (10/23/03, Office Action, p. 4)

Applicants respectfully submit that claim 1 is not anticipated by Mattson. Claim 1 recites the feature of *wherein the integrated device includes a **graphics processor** and a **central processing unit***. (Emphasis added) Mattson does not disclose this feature as can be seen by the following analysis of Mattson. Mattson discloses a method for managing a cache hierarchy. (Mattson, title) Although Mattson describes cache organizations having more than one processor as illustrated in Mattson's Figures 1a-1e, and 2, he fails to describe such processors. Nowhere does Mattson describe an integrated device as stated in applicants' claim 1. However, because

Mattson does not disclose *wherein the integrated device includes a **graphics processor** and a **central processing unit*** as taught by claim 1, applicants respectfully submit that claim 1 is not anticipated under 35 U.S.C. §102(b) by Mattson. Furthermore, because Mattson does not disclose this feature as taught by applicants and given that claims 2-6 depend directly or indirectly from claim 1, applicants respectfully submit that claims 1-6 are not anticipated under 35 U.S.C. §102(b) by Mattson.

The Examiner also rejected independent claim 7 under 35 U.S.C. §102(b) for the reason set forth in the rejection of claim 1. Claim 7 discloses substantially similar limitations as claim 1, and recites *wherein the integrated device includes a **graphics processor** and a **central processing unit.*** (Emphasis added) Because, Mattson does not disclose this feature as taught by applicants for the reasons discussed above with regard to claim 1, applicants respectfully submit that claim 7 is not anticipated under 35 U.S.C. §102(b) by Mattson. Furthermore, because Mattson does not disclose this feature as taught by applicants in independent claim 7 from which claims 8-10 depend, applicants respectfully submit that claims 7-10 are not anticipated under 35 U.S.C. §102(b) by Mattson.

Rejection Under 35 U.S.C. §103

The Examiner also rejected independent claim 11 under 35 U.S.C. §103(a) as being unpatentable over Mattson and alleged knowledge in the art. Claims 11-16 are patentable under 35 U.S.C. S. 103 in view of the references cited by the Examiner. Neither the cited reference, nor the alleged knowledge in the art teach (nor does the Office Action cite any portion which even suggests) the presently claimed feature of *wherein the integrated device includes a **graphics processor** and a **central processing unit.***

The Examiner states in part that "one of ordinary skill in the art would have recognized that a computer readable medium is well-known in the art." (10/23/03 Office Action, p. 6) Obviousness can only be established by combining or modifying the teachings of the prior art to

produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988).

In regard to the rejection of claim 11, even if Mattson and the alleged knowledge in the art were combined, such a combination would lack one or more features of claim 11 from which claims 12-16 directly or indirectly depend. Claim 11 recites the feature of *wherein the integrated device includes a* ***graphics processor*** *and a* ***central processing unit.*** (Emphasis added) As discussed above with regard to the rejection of claim 1, Mattson nor the alleged knowledge in the art disclose this feature.

Mattson does not disclose this feature as can be seen by the following analysis of Mattson. Mattson discloses a method for managing a cache hierarchy. (Mattson, title) Although Mattson describes cache organizations having more than one processor as illustrated in Mattson's Figures 1a-1e, and 2, he fails to describe such processors. Nowhere does Mattson describe an integrated device as stated in applicants' claim 11. However, because Mattson does not disclose *wherein the integrated device includes a* ***graphics processor*** *and a* ***central processing unit*** as taught by claim 11, it is respectfully submitted that claim 11 and dependent claims 12-15 are patentable under 35 U.S.C. §103(a) over Mattson and the alleged knowledge in the art.

Applicants respectfully submit that all rejections have been overcome. Consideration of this amendment should lead to favorable action that would overcome all remaining grounds of objection and/or rejection. If there are any additional charges, please charge Deposit Account No. 02-2666.

Respectfully submitted,

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Date: December 23, 2003 Sanjeet Dutta

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